

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

In re:  
M3 POWER RAZOR SYSTEM  
MARKETING & SALES PRACTICES  
LITIGATION

Civil Action No. 05-11177-DPW (Lead Case)

SCHEDULING ORDER

WOODLOCK, D.J.

This Order is intended primarily to aid and assist counsel in scheduling and planning the preparation and presentation of cases, thereby insuring the effective, speedy and fair disposition of cases, either by settlement or trial.

The above-entitled action having been heard on March 6, 2006, it is hereby ORDERED pursuant to Rule 16(b) of the Federal Rules of Civil Procedure and Local Rule 16.1(F), that:

<b>Plaintiffs shall file their Consolidated Complaint by</b>	<b>4/17/06</b>
<b>Defendant shall respond to Consolidate Complaint by</b>	<b>5/17/06</b>
<b>Disclosures</b> The Parties shall make the disclosures set forth in Fed.R.Civ.P. 26(a)(1). Defendant's initial disclosures pursuant to Fed.R.Civ.P. 26(a)(1) shall include, without limitation, any relevant discovery that it has previously produced in the Schick litigations in the District of Connecticut, Germany, and Australia, provided that an appropriate protective order has been entered as of the time for such initial disclosures. Gillette shall be obliged to provide a log identifying any documents withheld as privileged or not relevant.	<b>4/28/06</b>
<b>Class Certification Discovery completed by</b>	<b>6/30/06</b>
<b>Fact Discovery completed by</b>	<b>11/3/06</b>

<p><b>Expert Discovery.</b></p> <p>a. All trial experts are to be designated and disclosure of information contemplated by FRCP, Rule 26 provided by the party bearing the burden of proof on the issue by</p> <p>b. All trial experts are to be designated and disclosure of information contemplated by FRCP, Rule 26 provided by the party not bearing the burden of proof on the issue by</p> <p>c. All trial experts are to be designated and disclosure of information contemplated by FRCP, Rule 26 provided by any Rebuttal experts</p> <p>d. All expert discovery, including depositions, shall be completed by</p>	<p><b>1/5/07</b></p> <p><b>2/16/07</b></p> <p><b>3/30/07</b></p> <p><b>5/11/07</b></p>
<p><b>Class Certification</b></p> <p>a. Plaintiffs' Motion for Class Certification shall be filed by</p> <p>b. Defendant's response to class certification shall be filed by</p> <p>c. Plaintiffs may file a reply brief by</p> <p>d. Hearing on motion for Class Certification</p>	<p><b>7/31/06</b></p> <p><b>8/31/06</b></p> <p><b>9/22/06</b></p> <p><b>to be set in October 2006</b></p>
<p><b>Dispositive Motions</b></p> <p>a. Motions for Summary judgment shall be filed by</p> <p>b. Oppositions to motion for summary judgment filed by</p> <p>c. Reply brief may be filed by</p> <p>d. Hearing on Motion for Summary Judgment</p>	<p><b>6/29/07</b></p> <p><b>7/27/07</b></p> <p><b>8/10/07</b></p> <p><b>to be set End of August 2007</b></p>

All provisions and deadlines contained in this order having been established with the participation of the parties to this case, any requests for modification must be presented to the judge or magistrate judge, if referred for case management proceedings. Any requests for extension will be granted only for good cause shown supported by affidavits, other evidentiary materials, or reference to pertinent portions of the record. The request shall be made by motion and shall contain the reasons for the request, a summary of the discovery

which remains to be taken, and a date certain when the requesting party will complete the additional discovery, join other parties, amend the pleadings or file motions. The Court may then enter a final scheduling order, if necessary.

Counsel are encouraged to seek an early resolution of this matter. Additional case management conferences may be scheduled by the court or upon the request of counsel, if the Court can be of assistance in resolving preliminary issues or in settlement.

By the Court,

/s/ Michelle Rynne  
Deputy Clerk

DATED: March 7, 2006